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*Attorneys for Defendants Apartment Management  
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*  
PEGGY THORNTON, Realtor,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a  
foreign limited-liability company; TMIF II  
PORTOLA, LLC, a foreign limited-liability  
company; APARTMENT MANAGEMENT  
CONSULTANTS, LLC, a foreign limited  
liability company; and RENE  
RICHARDSON, as AGENT of PORTOLA  
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline  
for Defendants Apartment Management  
Consultants, LLC and Rene Richardson to  
Respond to the Second Amended  
Complaint**

**(Second Request)**

1 Relator Peggy Thornton and Defendants Apartment Management Consultants, LLC and  
2 Rene Richardson (collectively “AMC”), by and through their respective undersigned counsel,  
3 hereby stipulate to extend AMC’s deadline to respond to Ms. Thornton’s Second Amended  
4 Complaint (“SAC”) by two weeks, to and including **November 12, 2024**, with the following  
5 background and reasons:

- 6 1. Ms. Thornton filed her SAC on September 24, 2024. ECF No. 108.
- 7 2. Under FRCP 15, AMC’s response to the SAC was therefore due on October 8,  
8 2024.
- 9 3. The Parties stipulated to grant AMC an additional three weeks to assess the SAC  
10 given the multiple rounds of motion-to-dismiss briefing filed thus far and in light of AMC’s  
11 counsels’ conflicting work travel. ECF No. 113.
- 12 4. This extension also mirrored the one granted to co-defendant TMIF. ECF  
13 No. 110.
- 14 5. AMC now requests an additional two weeks, to and including November 12, 2024,  
15 to respond to the SAC given unexpected scheduling conflicts. Specifically, Ms. Dove and Mr.  
16 Kahn both serve as pro bono counsel in a First Amendment, Section 1983 suit pending before this  
17 District, which was just reassigned to the Honorable Richard F. Boulware, who issued an order  
18 several days ago unexpectedly advancing the pre-trial deadlines, including motions in limine, by  
19 two weeks, to next week – November 1, 2024. *Santopietro v. Howell, et al.*, 2:12-cv-01648-RFB-  
20 EJY, ECF No. 110.
- 21 6. Additionally, Mr. Kahn experienced severe food poisoning last week, greatly  
22 limiting his ability to work for several days.
- 23 7. The Parties agree that this stipulation is entered into in good faith and will not  
24 unduly delay proceedings, noting that this Court recently granted the stipulation staying discovery  
25 in this matter until any challenges to the SAC are resolved. ECF No. 109.

26 **IT IS SO STIPULATED.**  
27  
28

1 Dated: October 28, 2024.

2 SNELL & WILMER L.L.P.

3 By: /s/ Gil Kahn

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16 *Attorneys for Defendant Apartment*  
17 *Management Consultants, LLC and Rene*  
18 *Richardson*

Dated: October 28, 2024.

NEVADA LEGAL SERVICES

By: /s/ Elizabeth S. Carmona

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*Attorneys for Relator*

**ORDER**

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. AMC's deadline to respond to the Second Amended Complaint is extended to and including November 12, 2024.

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: October 29, 2024

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline for Defendants Apartment Management Consultants, LLC and Rene Richardson to Respond to the Second Amended Complaint** by method indicated below:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED October 28, 2024

/s/ Tiy Lewis  
An employee of SNELL & WILMER L.L.P.

4863-6867-5827